IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA

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STANLEY PERRIN
[Enter the full name of the plaintiff in this action]

v.

WILLIAM H. NICHOLSON; Attn.

Enter above the full name(s) of defendant(s) in this action

Civil Action No. 9:10-cv-1111-HFF-BM
(to be assigned by Clerk)

COMPLAINT

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I. PREVIOUS LAWSUITS

A. Have you begun other lawsuits in state or federal court dealing with the same facts involved in this action or otherwise related to your imprisonment? Yes_____ No ✓

B. If your answer to A is Yes, describe the lawsuit in the space below. If there is more than one lawsuit, describe the additional lawsuits on another piece of paper using the same outline.

1. Parties to this previous lawsuit:

   Plaintiff: __________

   Defendant(s): __________

2. Court: __________
   (If federal court, name the district; if state court, name the county)

3. Docket Number: __________

4. Name(s) of Judge(s) to whom case was assigned: __________

5. Disposition: __________
   (For example, was the case dismissed? Appealed? Pending?)

6. Approximate date of filing lawsuit: __________

7. Approximate date of disposition: __________

II. PLACE OF PRESENT CONFINEMENT

A. Name of Prison/Jail/Institution: Laurens Cty. Det. Ctr. (R. Eugene J. Det. Ctr.

B. What are the issues that you are attempting to litigate in the above-captioned case? ______

______

C. (1) Is there a prisoner grievance procedure in this institution? Yes______ No______

(2) Did you file a grievance concerning the claims you are raising in this matter? Yes ✓ No______

When 04-20-10 Grievance Number (if available)______

D. Have you received a final agency/departmental/institutional answer or determination concerning this matter (*i.e.*, your grievance)? Yes______ No ✓ Still waiting on Response!

E. When was the final agency/departmental/institutional answer or determination received by you? ______

If possible, please attach a copy of your grievance and a copy of the highest level decision concerning your grievance that you have received.

F. If there is no prison grievance procedures in this institution, did you complain to prison, jail, or institutional authorities? Yes______ No______

G. If your answer is YES:

1. What steps did you take? ______

2. What was the result? ______

III. PARTIES

In Item A below, place your name, inmate number, and address in the space provided. Do the same for additional plaintiffs, if any.

A. Name of Plaintiff: Stanley Perrin Inmate No.: 285760

Address: P.O. Box 329, R. Eugene Johnson Det. Ctr., Laurens, S.C. 29360

In Item B below, place the full name of the defendant, his official position, and place of employment in the space provided. Use Item C for additional defendants, if any.

B. Name of Defendant: William H. Nicholson Position: Attorney

Place of Employment: 109 West Court Ave., Greenwood, S.C. 29646

C. Additional Defendants (*provide the same information for each defendant as listed in Item B above*):

______

______

______

IV. STATEMENT OF CLAIM

State here, as briefly as possible, the facts of your case. Describe how each defendant is involved. Include also the names of other persons involved, dates, and places. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Use as much space as you need. Attach an extra sheet if necessary.

To whom this may concern, I would Like to sue my Trial Lawyer. my Lawyer Name is William Nicholson, And He was my Counsel IN 2001, 2002. IN June 2001 I was charged with murder IN Laurens County. my Defense was an Insanity Defense. This was my First charge. I Signed A Guilty PLea For 26 years. When I got to Prison IN 2002 OF July I Put IN A PCR. I won my PCR, And the STATE Appealed my PCR. I also won the Appeal IN 2009 march. IN march 2009 I was ReLeased From Perry Prison, And now I am at the Laures County Jail. I am Trying to get out ON bond. mr. John Ferguson was my PCR Lawyer, And his oFFice is IN Laurens SC. mrs. C Robinson was my Appeal Lawyer of Columbia. my lawyer was IN-effective IN ALot OF ways. At the Plea mr. Nicholson Never Let The Judge Know that I was INsane during the crime. Dr. watts was PrePared to TestiFy At the PleA that I was INsane. Dr. watts also TestiFy At the PCR that I was INcompetent From the Beginning. mr. Nichol-son Never Put my Competency Into question. The Laurens county Jail ReFused to give me mental Health Treatment. Jrell Byrd was over The Jail IN 2001 June. At my PCR Hearing my

IV. STATEMENT OF CLAIM - continued.

PCR Lawyer asked mr. Nicholson why didn't He Push For my Treatment. mr. Nicholson Answer was He Let Dr. Watts Handle that. Dr. Watts OFFice is IN Columbia. I was Not Able to Help mr. Nicholson IN my Defense. mr. Nicholson didn't Request A Blair Hearing. mr. Nicholson didn't Know Several Facts IN the case. mr. Nicholson didn't do an Adequate Investigation. At my Plea mr. Nich-olson STATed that I called my Lady Friend the Day of the crime. mr. Nicholson was wrong About the call She called me. my PCR Lawyer Said it was not Just A Call, But it was the call that lead up to the meeting of the motel. mr. Nicholson also said that I signed A motel Receipt the Day of the crime. He was also wrong About the Receipt, I didn't Sign A Receipt the Day of the crime. mr. Nicholson didn't Know where I was Arrested At. I would Like to Sue mr. Nicholson For mal Practice. when mr. Nicholson STATed that I called my Lady Friend it Showed that I Plan the meeting. mr. Nicholson also said that I SigNed A Fake Name on the Receipt. The Fake Name on the Receipt would Have Shown that I was trying to Hide something. I Have A Preponderant of evidents to Prove my claims I was Hospitalize Before the crime. None of my claims ARE Frivolous. my mother will be my contact Person Christine Perrin call After 4:00pm (864) 543-2890

V. RELIEF.

State briefly and exactly what you want the court to do for you.

I would Like For the court to be Fair to me. I also would Like to get A Refund OF $15,000 From mr Nicholson. I also would Like to get Paid For Pain, And Suffer. I Have been In Prison For 9 yrs, And Lost my Landscaping company. I Have been Through ALot. I am going to Have A New LiFE. my Lawyer IS Trying to get me Time Seure. I Lost Everything. For Pain, And Suffering I am asking For $900.000

I declare under penalty of perjury that the foregoing is true and correct.

Signed this Wed *day of* APRIL 22, 2010.

Stanley Perrin
Signature of Plaintiff